

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

JW ALUMINUM COMPANY,

Plaintiff,

v.

ACE American Insurance Company, Starr  
Technical Risks Agency, Inc., Westport  
Insurance Corporation, AIG Specialty  
Insurance Company, & General Security  
Indemnity Company of Arizona,

Defendants.

Civil Action No.: 2:21-cv-1034-BHH

**DECLARATION OF CHARLES J. ROCCO  
IN SUPPORT OF STARR TECHNICAL RISKS AGENCY, INC.'S MOTION TO  
DISMISS PURSUANT TO FED. R. CIV. P. 12 (b)(6)**

CHARLES J. ROCCO declares, under penalty of perjury:

1. I am a partner at the law firm Foran Glennon and am a member in good standing of the bar of the highest courts of the State of New York and New Jersey. I am also admitted to the United States District Court for the following districts: Northern District of New York, Eastern District of New York, Southern District of New York, and Western District of New York.

2. I have been retained by Defendant Starr Technical Risks Agency, Inc. (hereinafter, "Starr"), as well as Defendants Ace American Insurance Company, Westport Insurance Corporation and General Security Indemnity Company of Arizona in this matter. As such, I am fully familiar with the facts and circumstances of this matter as set forth herein.

3. I am in the process of seeking admission *pro hac vice* in this action.

4. I submit this affirmation in support of Starr's Motion to Dismiss Plaintiff JW Aluminum Company's ("JWA") Complaint.

5. ACE insured Plaintiff under a policy of insurance issued through its agent, Starr, bearing Policy No. EPRN14338688, for the relevant period of December 31, 2019, to December 31, 2020 (the "Policy"). A true and correct copy of the ACE Policy is annexed hereto as **Exhibit "A."**

**WHEREFORE**, Starr's Motion to Dismiss the must be granted.

Dated: June 24, 2021  
New York, New York

Respectfully Submitted,

By:   
Charles J. Rocco